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BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2011	Docket No. N2012-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS EMILY ROSENBERG TO PUBLIC REPRESENTATIVE INTERROGATORIES PR/USPS-T3-33 THROUGH 38 AND 40 THROUGH 46

The United States Postal Service hereby files the responses of witness Emily Rosenberg to the above-identified interrogatories of the Public Representative dated April 6, 2012, waiving its objection despite the fact that these interrogatories were filed long after the February 24, 2012 deadline for discovery directed at USPS-T-3 and do not constitute follow-up discovery. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-33
Please refer to page 13, line 16 of your testimony where, for purposes of modeling, you assumed that each 3-digit ZIP Code workload could be transported up to 200 miles to be processed by a plant. Under current mail processing standards what is the maximum distance a 3-digit ZIP code workload could be transported?

RESPONSE

Based on the L005 label list, for the contiguous 48 states, the farthest distance from 3-digit centroid to SCF Processing Facility is 330 miles.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-34
Please refer to Library Reference USPS-LR-N2012-1/15, file "CustomerDetails.twb" and explain how mileage bands (column O) are used within the LogicNet Optimization Model.

a. Please explain why the 3 digit ZIP Code 768 has a minimum distance of 136.2 miles to the closest processing facility (it is assigned to GROUP_150_to_160 instead of GROUP_130_to_140).
b. Please indicate if any other 3 digit ZIP Codes are assigned to a higher mileage band.

RESPONSE

The mileage group (Column O) of CustomerDetails is paired with feasible plant to customer lanes and used within Logic Net to set the maximum distance a Customer can be from the assigned plant.

a. Logic Net was used to derive the mileage bands. Model iterations were run to determine the mileage band to which each customer belonged. For example, when plant to customer lane was constrained to 150 miles, the model returned an infeasible result because ZIP Code 768, as well as other ZIP Codes, were not within 150 miles of a plant. The infeasible ZIP Codes could be identified in the error log. When the next iteration was run at 160 miles, the model returned an infeasible result, but ZIP Code 768 was not one of the infeasible ZIP Codes. Therefore, ZIP Code 768 was put in the mileage band group called GROUP_150_to_160. The distance is calculated internally by Logic Net and not explicitly stated in the reports we reviewed. Therefore, the exact mileage used by Logic Net cannot be stated here.

RESPONSE to PR/USPS-T3-34 (continued)

b. The method for calculating minimum distance was stated in part a. The mileage band calculations were spot checked but there was no formal process for recording the validation distances, and therefore this information is no longer available to make the comparisons requested in part b.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-35
Please confirm that the LogicNet Optimization model does not:

a. Utilize costs for transportation between mail processing facilities. If not confirmed please explain.
b. Utilize operating windows or capacity requirements for the FSS.
c. Please explain how one would calculate the capacity requirements of the FSS for use in the LogicNet Optimization Model. If additional data would be required to perform such a calculation, please provide it.

RESPONSE

a. Confirmed.

b. Confirmed

c. One way to model FSS, is to use the information within the FSS Decision Analysis Report to determine the mail pieces per machine that no longer require Incoming Secondary sort. If one assumes the FSS remain where they are currently deployed, the footprint of FSS machine plus required staging can be removed from the total facility square footage so the other ZIP Code – Shape combinations cannot utilize the square footage allotted to the FSS machines. In addition, the FSS volume should be removed from the ZIP Code-Shape square footage requirements and reflected in the demand file accordingly.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-36
Please refer to Library reference USPS-LR-N2012-1/13, Worksheet "Model MODS" rows 16 through 17 provide the operating windows for DPS Sort used in your model.

a. Please confirm that the 2nd pass of the DPS Sort ends at 7:09 am on day two.
b. Please also confirm that the proposed operating window for DPS sort, at page 35 of your testimony ends at 4 am.
c. Please reconcile these apparent discrepancies.

RESPONSE

a. Confirmed.

b. Confirmed.

c. Model results were adjusted to compensate for other constraints not considered by the model. In this case the DPS sort needed to end by 4 AM Day 2 to preserve a 2 day standard.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-37
Please confirm that a shorter window of 7 hours for cancellation and outgoing primary, instead of the 12 hours used in your LogicNet model, more facilities would be needed to accommodate the increased footprint? If not confirmed please explain.

RESPONSE

Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-38
Please refer to page 17, lines 10 through 15 of your testimony where you indicate that 61 sites from the LogicNet output were deactivated and 71 sites not in the LogicNet output were activated.

a. Please confirm this results in 187 facilities.
b. Please reconcile this figure with the 199 facilities referred to on page 34, line 17, of your testimony, where you indicate that there are 199 facilities.
c. Please explain when these additional 12 facilities were added and what was the basis for their addition?

RESPONSE

a-c. Not confirmed.

There are 10 sites that were not MODS sites (BEND, OR; COLBY, KS; DEVILS LAKE, ND; DURANGO, CO; ELY, NV; NORTH PLATTE, NE; ROCK SPRINGS, WY; TWIN FALLS, ID WOLF POINT, MT; WORLAND, WY) and thus were not counted in the 61. In addition, the FSS Annexes were not explicitly modeled (CLEVELAND OH FSS Annex and COLUMBUS OH FSS Annex).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-40
Please confirm that on page 26 of your testimony, lines 3 through 8 you indicate that when the proposed equipment for a site was constrained by the facility's workroom square footage multiple DPS sort schemes were consolidated to reduce the total number of machines needed by triple and quadruple banking the machines.

a. In how many sites did you need to make this change to triple and quadruple bank machines?
b. What fraction of the total number of facilities does this represent?

RESPONSE:

a. I am informed that in our initial modeling, updates were made to 48 sites.

b. 36 percent -- 48 out of 134 modeled letter sites.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-41
Please refer to page 21 of your testimony, lines 20 and 22 you indicate that you modeled the AFCS requirement using the 75th percentile of volume and the DBCS requirement for outgoing primary using the 95th percentile of volume.
a. Please confirm that Library reference USPS-LR-N2012-1/17 uses the same traffic volume as library reference USPS-LR-N2012-1/13 (which uses average traffic volumes).
b. Please explain where and how the 75th and 95th percentile are accounted for in library reference USPS-LR-N2012-1/17.

RESPONSE

a. Confirmed.

b. 75th and 95th percentile volumes were not used in USPS-LR-N2012-1/17. Page 21, lines 20 and 22 refer to the detailed equipment modeling step. LR 17 was used in a previous step and the volumes shown in LR 17 were not used for detailed equipment modeling.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-42
Please refer to page 25 of your testimony line 1, where you indicate that the DBCS requirement for DPS was determined using a peak factor of 120 percent of Fiscal Year 2010 average daily volume. In footnote 33 you indicate that the peak factor for the 95th percentile from 2009 data is 126 percent. Please explain which peak factor was used and reconcile this apparent discrepancy.

RESPONSE

A peak factor of 120 percent was applied to FY2010 average daily volume to determine DBCS requirements for DPS. The 120 percent peak factor used was based on the knowledge that the average 95th percentile peak factor for FY2009 was 126 percent.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-43
In USPS-LR-N2012-1/13 equipment square footage was inflated by 15 percent (cell H3 in “Model MODS”). In USPS-LR-N2012-1/17 equipment square footage was inflated by 20 percent (cell AT3 in “Model MODS”) to ensure adequate staging room under the new service standard. Please explain the discrepancy in square footage requirements between the two models.

RESPONSE

See the response to POIR No. 2 question 5.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-44
In "Model MODS" of both USPS-LR-N2012-1/13 and USPS-LR-N2012-1/17 a factor of 0.8 is used to calculate square footage requirements per hour for DBCS when both outgoing primary and DPS Sort processes are occurring. See Column BU in worksheet "Model MODS" in USPS-LR-N2012-1/17.

a. Please explain why a factor of 1 is not used?
b. Would your analysis change if a factor of 1 is used instead of 0.8?
c. If so, how would it change and what would be the implications?

RESPONSE

a-c. A factor of 0.8 is used when DPS1 and DPS2 have overlapping windows. Resources will be shared between DPS1 and DPS2. A 0.8 factor was used as an approximation of the reduction in square footage when these two processes overlap.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-45
Please refer to footnotes 26, 27, and 33 in your testimony. Please provide peak factors for the 96th, 97th, 98th, 99th percentile volumes for cancellation, outgoing primary, and DPS letters.

RESPONSE

National
Peak Factor
Fiscal Year 2010

	Percentile			
	96	**97**	**98**	**99**
Cancellations	181%	196%	222%	238%
Outgoing Primary Letters	172%	182%	197%	213%
DPS Letters	141%	143%	149%	155%

* *Source: WebEOR FY 2010 for sites that had at least 50 days processing, Peak factor calculated from Median Day. Median day is calculated excluding All holidays (including non-Monday), Tuesdays after a Monday holiday, and all Saturdays and Sundays. [1+(percentile-median)/median]*

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO PUBLIC REPRESENTATIVE INTERROGATORY

PR/USPS-T3-46
Please refer to footnote 35 in your testimony. Please provide peak factors for the 96th, 97th, 98th, 99th percentile volumes for, outgoing primary, incoming primary, and incoming secondary for flats.

RESPONSE

National
Peak Factor
Fiscal Year 2010

	Percentile			
	96	**97**	**98**	**99**
Outgoing Primary Flats	159%	165%	176%	190%
Incoming Primary Flats	164%	169%	180%	193%
Incoming Secondary Flats	166%	171%	180%	191%

* *Source: WebEOR FY 2010 for sites that had at least 50 days processing,*
Peak factor calculated from Median Day. Median day is calculated excluding All holidays (including non-Monday), Tuesdays after a Monday holiday, and all Saturdays and Sundays.
[1+(percentile-median)/median]